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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

STANLEY F. FROMPOVICZ, JR., CAROL  
FRAMPOVICZ

V.

UNION TOWNSHIP  
UNION TOWNSHIP BOARD OF SUPERVISORS  
SWANGER, KINDT, CARBAUGH, TSHUDY,  
JONES and DAVID MILLER/ASSOCIATES,  
INC.

NO. 1:CV00-1750

*J. Caldwell*

**FILED  
HARRISBURG**

JAN 22 2001

MARY E. D'ANDREA, CLERK  
Per 9/18  
DEPUTY CLERK

**MOTION TO EXTEND DEADLINES FOR SUBMISSION OF PLAINTIFFS'  
RESPONSE TO DEFENDANTS' MOTIONS TO DISMISS**

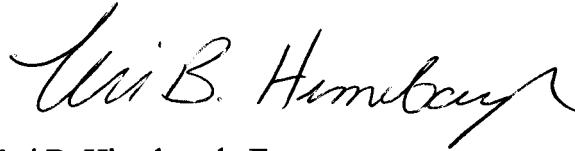
Plaintiffs, by and through counsel of record, Teri B. Himebaugh, do hereby motion this honorable court to grant an extension in which to file a Response to the Union Township Defendants' Motion to Dismiss.

Plaintiffs' Response is currently due on or before January 22, 2001. Plaintiffs are requesting that the Response now be due on January 26, 2001, which is only 4 days beyond the current deadline. Said extension is necessary in order to permit plaintiff's counsel and co-counsel adequate time to confer with the client and obtain any necessary documentation that will need to be appended to the Response. Said extension will not prejudice the parties.

Plaintiff's counsel has spoken with counsel for the Union Township Defendants and David Miller/Associates and they concur in the instant Motion.

WHEREFORE, plaintiffs respectfully request that the court grant their motion for an extension to file a Response to the Union Township Defendants' Motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Teri B. Himebaugh". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Teri B. Himebaugh, Esq.

Attorney for Plaintiffs

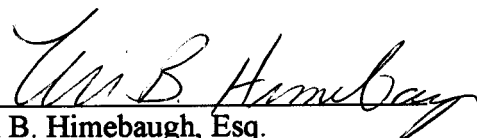
**CERTIFICATE OF SERVICE**

The undersigned counsel for Plaintiffs hereby certifies pursuant to 18 Pa.C.S. 4904 that a true and correct copy of the attached Motion for an Extension to file a Response to Defendants' Motion to Dismiss has been mailed first class, postage prepaid this 16th day of January, 2001 upon the following:

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